

Compliance Assessment Report CAR_NRW0050108

Permit being assessed: BU2349IL.

For: Alyn Works, **held by:** Synthite Limited

At: Denbigh Road, Mold, Flintshire, CH7 1BT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/11/2025 between 14:00 and 15:30.

Parts of permit assessed: See Below.

NRW Lead Officer: Philip Harper, accompanied by Victoria Taylor.

Report sent to: Technical Manager, Technical Manager, on 22/12/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C2 Significant	1.1.1(a)
IR2A - Installations - Operations - Permitted activities	C2 Significant	2.1.1
IR2C - Installations - Operations - Operating techniques	C3 Minor	2.3.1(a)

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
3	66

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR1A	See actions in main text	28/02/2026
IR2A	See actions in main text	28/02/2026
IR2C	See actions in main text	31/01/2026

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

At 14:00 on the 26th November 2025 the site was inspected by NRW officers Phil Harper, Lead Specialist Industry & Waste Regulation and Victoria Taylor, Senior Industry & Waste Regulation. The site was operational at the time of the inspection.

New Formox Plant

The new Formox plant was operational and producing formaldehyde at the time of the inspection - the operation of the new plant is not currently authorised by the environmental permit.

A permit variation application was received by NRW for the operation of the new Formox plant in September 2024. The application was assessed as not duly made due to insufficient information in November 2025, there is currently no active application to vary the permit in an attempt to authorise the operation of the new plant.

NRW has taken the view that the operation of the new Formox plant without the relevant permit being in place could lead to a significant adverse environmental impact as various aspects of the process have not been technically assessed as part of the NRW permitting process.

Furthermore, during this inspection, NRW also confirmed that the existing Formox plant was operating concurrently with the new plant, materially increasing the installation's capacity and the potentially foreseeable environmental impact compared to previous findings.

A category 2 score has been applied under subheading IR2A Permitted Activities against permit condition 2.1.1.

As discussed in a previous compliance assessment report, NRW records show that the operator was warned that NRW was experiencing long permitting queues and that the operation of the new Formox plant without a permit is an offence under the Environmental Permitting Regulations 2016. The operation of the new Formox plant is an indication that management practices are inadequate in ensuring compliance and demonstrates deliberate disregard for previous advice and guidance, and the regulatory requirements.

A category 2 score has been applied under subheading IR1A Management against permit condition 1.1.1.

NRW will now consider its enforcement response in relation to this issue.

Action 1: The operator should cease operation of the new Formox Plant with immediate effect.

Action 2: The operator shall send the following information to NRW by the **1st February 2026**.

-The inventory of methanol at Synthite per week from the 1st January 2025 to the 31st January 2026.

-The total tonnage of formaldehyde solution produced at Synthite per week from the 1st January 2025 to the 31st January 2026.

A12 Fabric Filters – Paraformaldehyde Production

NRW are aware that the operator is exploring the installation of a carbon filter at emission point A12 to reduce formaldehyde emissions. This work is still ongoing.

Action 3: Update NRW once timelines are known for the improvements at emission point A12.

A15 Wet scrubber – Tanker loading of formalin

The A15 emission point has been ducted into the A16 emission point after the wet scrubber, physically removing the emission point.

This change has not been subject to a permit variation, therefore, it has not been technically assessed by NRW's permitting service. It should also be noted that the A16 emission point is regularly in exceedance of its permitted formaldehyde emissions value, and without an assessment it is unknown what effect the increased loading on the abatement at A16 will have on overall emissions values. NRW has taken the view that this is an unpermitted change in operating technique attracting a **category 3 score** against permit condition 2.3.1(a) under subheading IR2C.

The change to duct A15 into A16 was not managed in accordance with the site's management system. The modification was implemented without prior assessment or approval, which indicates that the management system did not prevent an unpermitted change in operating technique.

This is considered a breach of permit condition 1.1.1 and attracts a **category 3 score under subheading IR1A Management. This score has been consolidated with an earlier score against 1.1.1.**

Action 4: Undertake emissions monitoring and report any changes in emissions values at A16 with the quarter 4 monitoring returns which are due 31st December 2025. Data to be sent to NRW with the quarterly emissions monitoring return by the **31st January 2026**.

Site Drainage

Drainage had been improved around the Formox plant and it was noted that standing water which had previously been observed was not present.

The operator discussed that further improvements were planned to help surface water drain to the

lower site more efficiently.

Kind Regards

Phil Harper

Lead Specialist - Industry & Waste Regulation NE

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If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.